

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA

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Alexander Nelson,

Case No. 23-cv-525 NEB/JFD

Plaintiff,

**AMERICAN MODERN INSURANCE  
GROUP, INC.'S MOTION TO  
COMPEL DISCOVERY**

v.

American Modern Insurance Group, Inc.,  
NCM Insurance Agency, LLC,

Defendants.

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Defendants American Modern Insurance Group, Inc. (“American Modern”), by and through its counsel, hereby moves this Court, pursuant to Federal Rule of Civil Procedure 37 and Local Rule 37.1, for an Order (a) compelling Plaintiff Alexander Nelson to produce all responsive documents and information in response to Defendants’ Rule 34 Requests for Document Production, (b) compelling Plaintiff Alexander Nelson to provide supplemental responses to Defendants’ Rule 33 Interrogatories, and (c) award American Modern reasonable expenses incurred in making this motion, including reasonable attorneys’ fees. This Motion is based upon the record in the case as well as American Modern’s opening Memorandum of Law, the Declaration of Larry E. LaTarte and all exhibits thereto, American Modern’s Reply Memorandum of Law (if one is filed), and arguments of counsel.

This Motion is accompanied by (a) American Modern’s Notice of Hearing, (b) American Modern’s Opening Memorandum of Law, (c) American Modern’s Word Count Certificate, (d) American Modern’s L.R. 7.1(a)(1) Meet-and-Confer Statement, (e) the

Declaration of Larry E. LaTarte and all exhibits thereto, and (f) a Proposed Order granting this Motion, of which an editable version is being emailed concurrently with this filing to Chamber in accordance with the Local Rules.

Dated: March 14, 2024

/s/ Larry E. LaTarte  
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